

1 Kathleen J. England, NV Bar #206
2 ENGLAND LAW OFFICE
3 630 S. Third Street
4 Las Vegas NV 89101
5 (702)385-3300
6 kengland@englandlawoffice.com

7 Melanie A. Hill, NV Bar #8796
8 LAW OFFICE OF MELANIE HILL
9 9345 W. Sunset Road, Suite 100
10 Las Vegas, NV 89148
11 (702)362-8500
12 (702)362-8505 (fax)
13 Melanie@MelanieHillLaw.com
14 Attorneys for Plaintiff, Sandra K. Krause

15
16 UNITED STATES DISTRICT COURT
17
18 DISTRICT OF NEVADA

19
20 SANDRA K. KRAUSE,) Case No.: 2:12-cv-00342-JCM-CWH
21 Plaintiff,)
22 vs.)
23 NEVADA MUTUAL INSURANCE)
24 COMPANY and TREAN CORPORATION,) STIPULATION FOR EXTENSION FOR
25 Defendants.) PLAINTIFF TO FILE HER OPPOSITON
26) TO DEFENDANTS' RULE 37(b)
27) MOTION FOR SANCTIONS AND
28) CONTEMPT [Dkt. 80]
29)
30) (First Request)

31
32 Defendants filed their Rule 37(b) Motion for Sanctions and Contempt [Dkt. 80] on the
33 Friday before Memorial Day weekend, May 24, 2013, and it was filed under seal. As a result of
34 the filing under seal, counsel for Defendants mailed the Motion to counsel and it wasn't received
35 by the undersigned until the following Wednesday, May 29, five days after it was filed due to the
36 holiday weekend.

37
38 The justification for said extension is that Plaintiffs lead counsel who is handling this matter
39 along with co-counsel will be unable to complete Plaintiff's opposition to Defendants Motion for

ENGLAND LAW OFFICE
ATTORNEYS AT LAW
630 SOUTH THIRD STREET
LAS VEGAS, NEVADA 89101
(702) 385-3300 • FAX (702) 385-3823

1 Sanctions and Contempt because Ms. England has been out of state on State Bar of Nevada
 2 business since Thursday, June 6, and she did not return until Sunday, June 9, 2013. Upon her
 3 return, and in addition to this opposition and other oppositions and a reply plaintiff's counsel are
 4 preparing in this case, counsel are preparing for two separate depositions in another case.
 5

6 Like Ms. England, Ms. Hill is a sole practitioner and had to attend to other pressing case
 7 commitments in a few of her federal criminal cases over the last week and a half and she has been
 8 unable to complete the opposition. Additionally, due to the nature of the motion, additional time
 9 is necessary to properly and completely oppose the Motion for Sanctions and Contempt and a
 10 modest ten day extension of the deadline is warranted.
 11

12 At the request of Plaintiff's counsel, and as a professional courtesy among counsel, the
 13 parties agree to allow the Plaintiff a ten (10) day extension of time to file her opposition to
 14 Defendants Motion for Sanctions and Contempt. Plaintiff respectfully requests that the Court
 15 grant this stipulation allowing the Plaintiff an additional ten days (10) from Monday, June 10,
 16 2013 to and including Thursday, June 20, 2013. This modest extension would not unduly delay
 17 or prejudice anyone in this matter and is warranted under the circumstances and based on the
 18 current procedural posture of this case.
 19

20 THERFORE, THE PARTIES HERERBY STIPULATE AND AGREE that the time for
 21 Plaintiff to file her opposition to Defendants Motion for Sanctions and Contempt be extended for
 22 ten days from Monday, June 10, 2013 to and including Thursday, June 20, 2013.
 23

Respectfully submitted: June 10, 2013.

24 By: /s/ Melanie A. Hill
 25 Melanie A. Hill
 26 Law Office of Melanie Hill
 27 9345 W. Sunset Rd., Suite 100
 28 Las Vegas, NV 89148
Attorneys for Plaintiff,
Sandra K. Krause

By: /s/ Shannon McDonough
 Shannon M. McDonough
 Lisa Bachman
 Fafinski Mark & Johnson, P.A.
 775 Prairie Center Drive, Suite 400
 Eden Prairie, MN 55344
Attorneys for Defendants TREAN and NMIC

ENGLAND LAW OFFICE
 ATTORNEYS AT LAW
 630 SOUTH THIRD STREET
 LAS VEGAS, NEVADA 89101
 (702) 385-3300 • FAX (702) 385-3823

ORDER

Based on the foregoing Stipulation of the parties and good cause appearing,

IT IS HEREBY ORDERED that the time for Plaintiff to file her opposition to Defendants Motion for Sanctions and Contempt be extended for ten days from Monday, June 10, 2013 to and including **Thursday, June 20, 2013**.

DATED this 11th day of June, 2013.

Carl W. Hoffman

~~U.S. Magistrate Judge Carl W. Hoffman~~

ENGLAND LAW OFFICE
ATTORNEYS AT LAW
630 SOUTH THIRD STREET
LAS VEGAS, NEVADA 89101
(702) 385-3300 • FAX (702) 385-1414
14
15
16
17
18
19